UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: APR 26 1991

SUBJECT: Draft Feasibility Study Report, L.E. Carpenter & Company Facility, Morris County, New Jersey.

FROM: Dore LaPosta, Chief
Groundwater Management Section

TO: Robert McKnight, Chief
New Jersey Superfund Branch I

In response to your request and in accordance with the Memorandum of Interdivisional Cooperation between the Emergency and Remedial Response Division (ERRD) and the Water Management Division (WMD), we have reviewed the Draft Feasibility Study for the L.E. Carpenter & Company site, and offer the following comments:

- The last paragraph of section 2.2.1 Groundwater Standards states that "... the site is a potential source of drinking water, MCL's are regarded as relevant and appropriate requirements." We have determined that the site is located within the boundaries of the Upper Rockaway Sole Source Aquifer, a regional designation created to protect groundwater resources. Groundwater at the site is therefore classified as at least Class IIA Current Source of Drinking Water. As a result, MCL's are the minimum ARAR for groundwater, and the 500 series of analytical methods are required for all determinations of Volatile Organic Compound (VOC) concentrations in groundwater samples.

- The following Federal Safe Drinking Water Act (FSDWA) MCL's listed in Table 2-1 Groundwater/Drinking Water ARARs on pages 2-4 and 2-5 which are bracketed to denote Proposed MCL's have been finalized at the indicated values, and may be referenced to: Environmental Protection Agency (EPA) National Primary Drinking Water Regulations: Final Rule. Federal Register, Vol. 56, No. 20, January 30, 1991.

Volatile Organics	Inorganics
Monochlorobenzine	Cadmium
Ethylbenzine	Chromium
Toluene	Selenium
Xylene	

Additionally, an MCL for Aroclor of 2 ug/L was promulgated, and therefore is the mandated standard.

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- The enforceable MCL for lead is currently 50 ug/L. The proposed standard presented in Table 2-1 of 5 ug/L is no longer valid. A lead Action Level of 15 ug/L is scheduled to be signed by the Administrator on April 30, 1991. This Action Level is reported to be relevant to point of use. We will inform you of the actual date that the Action Level is effective, and of any changes that occur.

- The discussion of Aroclor contamination on page 1-17 reports a maximum concentration found on-site of 2.9 mg/kg, and an ECRA soil action level range of 1 to 5 mg/kg. WM suggests that the FS indicate why the maximum soil action concentration is applicable to the site.

- The third assumption presented in Table 5-1 Capture Zone Modeling Parameters and Assumptions on page 5-9 notes threat "The model ignores the effect of groundwater flow from the intermediate to the shallow zone. This assumption results in an overestimation of each well's capture zone." WM suggests that the degree of overestimation be evaluated, and that the resulting capture zones be presented.

If you have any questions regarding these comments, please contact Dennis McChesney of my staff at extension 5543.

cc: John Josephs, NJSB I
R. Hargrove, EIB